

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS

United States Courts  
Southern District of Texas  
FILED

MARY SEGUIN,  
*pro se*

FEB 12 2024

*Plaintiff,*

Nathan Ochsner, Clerk of Court

VS.

Civil Action No. 4:23-cv-04562

TYLER TECHNOLOGIES, INC.; GERO MEYERSIEK; BARBARA GRADY;  
RHODE ISLAND DEPARTMENT OF HUMAN SERVICES in its official capacity; MICHAEL  
D. COLEMAN, DEBORAH A. BARCLAY in their individual and official capacities;  
RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN  
TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA  
CABALLEROS, TIMOTHY FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD,  
PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, in their individual and  
official capacities; RHODE ISLAND JUDICIARY in its official capacity; PAUL A. SUTTELL  
in his individual and official capacity as EXECUTIVE HEAD OF RHODE ISLAND  
JUDICIARY; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS in its  
official capacity; RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR  
COURT in its official capacity; RHODE ISLAND JUDICIAL COUNCIL in its official capacity;  
RHODE ISLAND SUPERIOR COURT in its official capacity; RHODE ISLAND SUPERIOR  
COURT JUDICIAL COUNCIL in its official capacity; THE JUDICIAL TECHNOLOGY  
CENTER in its official capacity; JULIE HAMIL, MARISA BROWN, JOHN JOSEPH  
BAXTER, JR., JUSTIN CORREA in their individual and official capacities; RHODE ISLAND  
OFFICE OF THE ATTORNEY GENERAL in its official capacity; RHODE ISLAND OFFICE  
OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT in its official capacity;  
ADAM D. ROACH, PETER NERONHA in their official and individual capacities;  
*Defendants*

**RETURN OF SUMMONS/PROOF OF SERVICE**

**FOR ENTRY OF DEFAULT**

**BY AFFIDAVIT**

MARY SEGUIN, hereby declares under penalty of perjury, pursuant to 28 U.S.C. sec.  
1746(2) that the following statements are true and correct:

1. That I am the Plaintiff, Pro Se, in the above captioned matter.

2. Pursuant FRCP 4, I served upon all the Defendants the Summons and Complaint, along with a copy of the Court's Order dated December 6, 2023 (ECF 3) using United States Postal Service Certified Mail, Return Receipt Requested.
3. The United States Postal Service accordingly served the all the named Defendants, and Plaintiff received the return receipt requested for all named Defendants. Plaintiff attached said receipts to Plaintiff's Requests for Entry of Default, (ECF 6, ECF 11).
4. The Defendants TYLER TECHNOLOGIES, INC.; GERO MEYERSIEK; BARBARA GRADY; RHODE ISLAND DEPARTMENT OF HUMAN SERVICES; MICHAEL D. COLEMAN, DEBORAH A. BARCLAY; RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS, TIMOTHY FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD, PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, RHODE ISLAND JUDICIARY, PAUL A. SUTTELL, EXECUTIVE HEAD OF RHODE ISLAND JUDICIARY; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS, RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR COURT, RHODE ISLAND JUDICIAL COUNCIL, RHODE ISLAND SUPERIOR COURT, RHODE ISLAND SUPERIOR COURT JUDICIAL COUNCIL, THE JUDICIAL TECHNOLOGY CENTER, JULIE HAMIL, MARISA BROWN, JOHN JOSEPH BAXTER, JR., JUSTIN CORREA, RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT, ADAM D. ROACH, and PETER NERONHA were served through the United States Postal Service Certified Mail Return Receipt Requested the with copies of Plaintiff's Summons and Complaint, and the Court's Order dated December 6, 2023 [ECF 3] as provided by Rule 4, Federal Rules of Civil Procedure;
  - a. Defendants TYLER TECHNOLOGIES, INC.; RHODE ISLAND DEPARTMENT OF HUMAN SERVICES; MICHAEL D. COLEMAN, DEBORAH A. BARCLAY; RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS, TIMOTHY

FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD, PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, RHODE ISLAND JUDICIARY, PAUL A. SUTTELL, EXECUTIVE HEAD OF RHODE ISLAND JUDICIARY; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS, RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR COURT, RHODE ISLAND JUDICIAL COUNCIL, RHODE ISLAND SUPERIOR COURT, RHODE ISLAND SUPERIOR COURT JUDICIAL COUNCIL, THE JUDICIAL TECHNOLOGY CENTER, JULIE HAMIL, MARISA BROWN, JOHN JOSEPH BAXTER, JR., JUSTIN CORREA, RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT, ADAM D. ROACH, and PETER NERONHA are political subdivisions and/or employees and/or acting in the capacity of the political subdivisions of Defendant RHODE ISLAND DEPARTMENT OF HUMAN SERVICES and/or Defendant RHODE ISLAND JUDICIARY and/or Defendant RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL. Under the Rhode Island Government Tort Liability Act **R.I. Gen. Laws § 9-31-1 *et seq.***, the afore-named Defendants in this tort damages action can be served upon the RHODE ISLAND OFFICE OF ATTORNEY GENERAL. See **R.I. Gen. Laws § 9-31-7**. Link to law: [webserver.rilin.state.ri.us/Statutes/Title9/9-31/9-31-1.HTM](http://webserver.rilin.state.ri.us/Statutes/Title9/9-31/9-31-1.HTM); [webserver.rilin.state.ri.us/Statutes/TITLE9/9-31/9-31-7.htm](http://webserver.rilin.state.ri.us/Statutes/TITLE9/9-31/9-31-7.htm)

- b. Accordingly, Defendant RHODE ISLAND OFFICE OF ATTORNEY GENERAL was served with the Summons and Complaint.
- c. Upon Plaintiff's information per USPS return receipt requested card and belief, the Defendants were served. Upon Plaintiff's information and belief, the Defendants TYLER TECHNOLOGIES, INC.; GERO MEYERSIEK; BARBARA GRADY; RHODE ISLAND DEPARTMENT OF HUMAN SERVICES; MICHAEL D. COLEMAN, DEBORAH A. BARCLAY; RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT,

KARLA CABALLEROS, TIMOTHY FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD, PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, RHODE ISLAND JUDICIARY, PAUL A. SUTTELL, EXECUTIVE HEAD OF RHODE ISLAND JUDICIARY; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS, RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR COURT, RHODE ISLAND JUDICIAL COUNCIL, RHODE ISLAND SUPERIOR COURT, RHODE ISLAND SUPERIOR COURT JUDICIAL COUNCIL, THE JUDICIAL TECHNOLOGY CENTER, JULIE HAMIL, MARISA BROWN, JOHN JOSEPH BAXTER, JR., JUSTIN CORREA, RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT, ADAM D. ROACH, and PETER NERONHA are neither an infant nor an incompetent person requiring special service in accordance with Rule 4, Federal Rules of Civil Procedure, and are not serving with the armed forces of the United States as defined by the Service Members Civil Relief Act of 2003, as amended, entitled to the protection of 50 U.S.C. App. Section 520;

- d. The Defendants TYLER TECHNOLOGIES, INC.; GERO MEYERSIEK; BARBARA GRADY; RHODE ISLAND DEPARTMENT OF HUMAN SERVICES; MICHAEL D. COLEMAN, DEBORAH A. BARCLAY; RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS, TIMOTHY FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD, PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, RHODE ISLAND JUDICIARY, PAUL A. SUTTELL, EXECUTIVE HEAD OF RHODE ISLAND JUDICIARY; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS, RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR COURT, RHODE ISLAND JUDICIAL COUNCIL, RHODE ISLAND SUPERIOR COURT, RHODE ISLAND SUPERIOR COURT JUDICIAL COUNCIL, THE JUDICIAL TECHNOLOGY CENTER, JULIE HAMIL, MARISA BROWN, JOHN JOSEPH BAXTER, JR., JUSTIN CORREA, RHODE ISLAND

OFFICE OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT,  
ADAM D. ROACH, and PETER NERONHA neither answered nor otherwise  
defended the Plaintiff's Summons and Complaint, and the time to do so, as  
provided in Rule 12(a), Federal Rules of Civil Procedure, has expired;

- e. Copies of this Affidavit have this date been filed with the Clerk of the Court,  
and the Requests for Entry of Default were filed and docketed ECF 6, ECF 11.

Respectfully submitted,

Date: February 12, 2024

MARY SEGUIN



Mary Seguin

P.O. Box 22022

Houston, TX 77019

[maryseguin22022@gmail.com](mailto:maryseguin22022@gmail.com)

## Exhibit A

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

RHODE ISLAND JUDICIARY  
 LIGHT JUDICIAL COMPLEX  
 250 BENEFIT ST.  
 PROVIDENCE, RI 02903



9590 9402 8625 3244 0269 18

2. Article Number (Transit)

9589 0710 5270 1013 5338 41

**COMPLETE THIS SECTION**

A. Signature

X

B. Received by (Print Name)

D. Is delivery address different from the return address?  
If YES, enter delivery address:

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Insured Mail Restricted Delivery (over \$500)

# U.S. Postal Service™

## CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.gov](http://www.usps.gov)

Providence, RI 02903

Certified Mail Fee \$4.35

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$0.00
- ☐ Return Receipt (electronic) \$0.00
- ☐ Certified Mail Restricted Delivery \$0.00
- ☐ Adult Signature Required \$0.00
- ☐ Adult Signature Restricted Delivery \$0.00

Postage \$15.60

\$

Total Postage and Fees

\$23.50

\$

Sent To

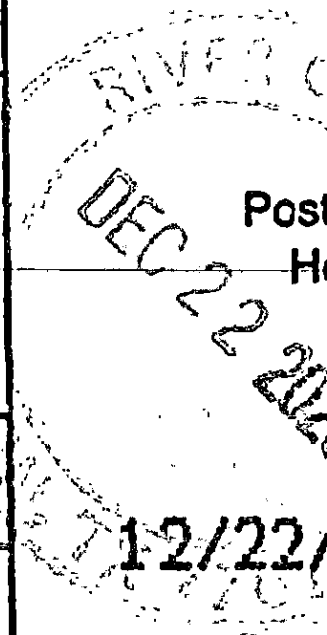
RHODE ISLAND JUDICIAL

Street and Apt. No., or PO Box No.

LIGHT JUDICIAL COMPLEX 250 BE

City, State, ZIP+4®

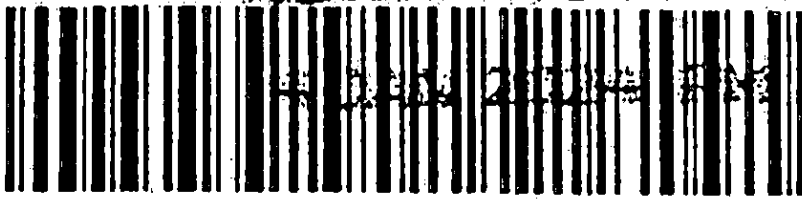
PROVIDENCE, RI 0



9589 0710 0225 1013 5338 41



USPS TRACKING #



9590 9402 8625 3244 0269 18

United States  
Postal Service

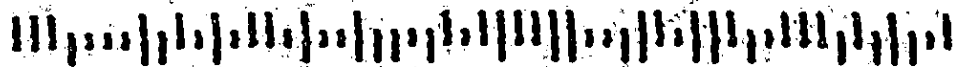
• Sender: Please print your name, address, and ZIP+

MARY SEGUIN

~~250 BENNETT~~

PO BOX 22022  
HOUSTON, TX 770

ENT



**U.S. Postal Service**  
**CERTIFIED MAIL® RECEIPT**  
**Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**PROVIDENCE, RI 02903**

**Postage and Fees** \$15.60

Adult Signature Restricted Delivery	\$8.00
Adult Signature Required	\$0.00
Certified Mail Restricted Delivery	\$0.00
Return Receipt (electronic)	\$0.00
Return Receipt (hardcopy)	\$0.00
Services & Fees (check box, add fee if applicable)	\$2.55
<b>Postage and Fees</b>	<b>\$4.35</b>

**Postage and Fees** \$3.50

**State, ZIP+4®** PROVIDENCE, RI 02903

**150 SOUTH MAIN ST.**

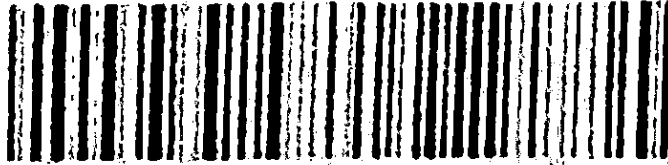
**RHODE ISLAND OFFICE OF ATTORNEY GENERAL**

**01/04/2024**

**0048 26**

**Postmark Here**

USPS TRACKING#



9590 9402 8638 3244 5327 10



First  
Class  
US  
Postage

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4®

MARY SEGUIN  
PO BOX 22022  
HOUSTON, TX 77019

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

RHODE ISLAND OFFICE OF  
ATTORNEY GENERAL  
150 SOUTHMAIN ST.  
PROVIDENCE, RI 02903



9590 9402 8638 3244 5313 24

**2. Article Number (Transfer from service label)**

9589 0710 5270 1013 5376 89

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

X

**B. Received by (Printed Name)****D. Is delivery address different from B?**  
If YES, enter delivery address below**3. Service Type**

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Registered Mail
- ☐ Registered Mail Restricted Delivery

Do

9589 0710 5270 7013 5338 72

# U.S. Postal Service™

## CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Providence, RI 02903

Certified Mail Fee **\$4.35**

\$

**\$3.55**

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ **\$0.00**
- ☐ Return Receipt (electronic) \$ **\$0.00**
- ☐ Certified Mail Restricted Delivery \$ **\$0.00**
- ☐ Adult Signature Required \$ **\$0.00**
- ☐ Adult Signature Restricted Delivery \$ **\$0.00**

Postage **\$15.60**

\$

Total Postage and Fees

\$

\$

Sent To

**RI. OFFICE OF CHILD SUPPORT**

Street and Apt. No., or PO Box No.

**77 DORRANCE ST.**

City, State, ZIP+4®

**PROVIDENCE, RI 02903**

PS Form 3800, January 2023 PSN 7530-02-000-9017 See Reverse

DEC 22 2023

12/22/23

9589 0710 5270 0125 0107 5337 42

# U.S. Postal Service™

## CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.gov](http://www.usps.gov)

Providence, RI 02903

Certified Mail Fee \$4.35

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

\$

☐ Return Receipt (electronic)

\$

☐ Certified Mail Restricted Delivery

\$

☐ Adult Signature Required

\$

☐ Adult Signature Restricted Delivery

\$

Postage

\$15.60

\$

Total Postage and Fees

\$

Sent To

GERO MEYERSIEK

Street and Apt. No., or PO Box No.

86 ELTON ST.

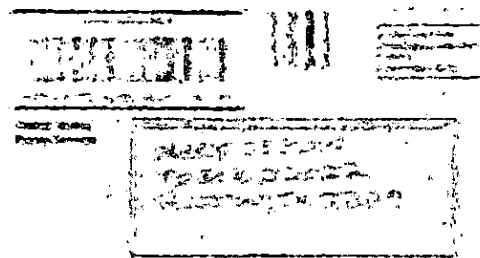
City, State, ZIP+4®

PROVIDENCE, RI 02

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for

12/22/2

Postm  
Her







U.S. Postal Service

## CERTIFIED MAIL RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.gov](http://www.usps.gov)

Cranston, RI 02920

Certified Mail Fee \$4.35

Extra Services &amp; Fees (Cross out any fee you do not want)

- ☐ Return Receipt (hardcopy) \$0.00
- ☐ Return Receipt (electronic) \$0.00
- ☐ Certified Mail Restricted Delivery \$0.00
- ☐ Adult Signature Required \$0.00
- ☐ Adult Signature Restricted Delivery \$0.00

Postage \$15.60

Total Postage and Fees \$23.50

Sent To

RI DEPARTMENT OF HUMAN

Street and Apt. No., or PO Box No.

25 HOWARD AVE. BUILDING

City, State, ZIP+4®

CRANSTON, RI 02920

Postmark  
Here

12/22/20

9589 0710 5270 1013 5338 65

RI DEPARTMENT OF HUNTING & FISHING  
HOWARD AVE. BUILDING 57  
PROVIDENCE, RI 02902

U.S. Postal Service

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Providence RI 02903

Certified Mail Fee \$4.35

Extra Services & Fees (check box, add fee to postage)

- ☐ Return Receipt (hardcopy) \$12.55
- ☐ Return Receipt (electronic) \$0.00
- ☐ Certified Mail Restricted Delivery \$0.00
- ☐ Adult Signature Required \$0.00
- ☐ Adult Signature Restricted Delivery \$0.00

Postage \$15.60

Total Postage and Fees \$23.50

0048 26

DEC 22 2023

12/22/2023

Sent to R.I. Office of Child Support Service

Street and Apt. No., or PO Box No.

77 DORRANCE ST.

City, State, ZIP+4® PROVIDENCE, RI 02903

22 8 55 101 0225 0720 685

U.S. Postal Service

**CERTIFIED MAIL® RECEIPT****Domestic Mail Only**For delivery information, visit our website at [www.usps.gov](http://www.usps.gov)

Providence, RI 02908

Certified Mail Fee

\$4.35

\$

Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

\$

\$0.00

☐ Return Receipt (electronic)

\$

\$0.00

☐ Certified Mail Restricted Delivery

\$

\$0.00

☐ Adult Signature Required

\$

\$0.00

☐ Adult Signature Restricted Delivery

\$

Postage

\$15.60

\$

Total Postage and Fees

\$23.50

Sent To

BARBARA GRADY

Street and Apt. No., or PO Box No.

975 SMITH ST

City, State, ZIP+4®

PROVIDENCE, RI 02908


Post

H

JAN

01/04/24

9589 0710 5270 1017 0225 0710 6856 72 9235 5376 72

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature</p> <p><b>X</b></p>
<p>1. Article Addressed to:</p> <p style="text-align: center;"><b>RI OFFICE OF CHILD SUPPORT SERVICES</b></p> <p style="text-align: center;"><b>77 DORRANCE ST.</b></p> <p style="text-align: center;"><b>PROVIDENCE, RI 02903</b></p>  <p style="text-align: center;">9590 9402 8638 3244 5327 10</p>	<p>B. Received by (Printed Name)</p> <p>D. Is delivery address different from A? If YES, enter delivery address below:</p> 
<p>2. Article Number (Transfer from service label)</p>	<p>3. Service Type</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Adult Signature</li> <li><input type="checkbox"/> Adult Signature Restricted Delivery</li> <li><input type="checkbox"/> Certified Mail®</li> <li><input type="checkbox"/> Certified Mail Restricted Delivery</li> <li><input type="checkbox"/> Collect on Delivery</li> <li><input type="checkbox"/> Collect on Delivery Restricted Delivery</li> <li><input type="checkbox"/> Insured Mail</li> <li><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</li> </ul>
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BARBARA GRADY  
 DUGAN GRADY LAW OFFICES  
 975 SMITH ST  
 PROVIDENCE, RI 02908



9590 9402 8638 3244 5313 17

2. Article Number (Transfer from Service Label)

9589 0710 5270 1013 5376 72

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

B. Received by (Printed Name)

D. Is delivery address different from B?  
 If YES, enter delivery address below

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

Mail

Mail Restricted Delivery

001